

FILED

MAY 21 2020

CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY La DEPUTY

1 BILL LIETZKE
P. O. BOX 4732
2 MONTGOMERY, ALABAMA 36104

3 IN THE UNITED STATES DISTRICT COURT
4 FOR THE DISTRICT OF TEXAS

5 BILL LIETZKE,) CASE NO.
6 PLAINTIFF,)
7 VS.)
8 COUNTY OF MONTGOMERY, ET AL,)
9 REESE MCKINNEY, PROBATE JUDGE,)
D. T. MARSHALL, SHERIFF,)
10 DEFENDANTS.)

W20CA414

11 1. And I looked and beheld a pale horse, YOU, and the name of them
12 that sat upon it was Death, YOU, and Hell followed, YOU, and it set out
13 to conquer a fourth part of the Earth, to kill with the sword, and with
14 hunger, and with the beasts of the Earth, and with Death, YOU.

15 2. And I saw the Great White Throne Judgment, and Him that sat upon
16 it from whose face the Earth and Heaven fled away, and there was found
17 no place for them, YOU, and the books were opened, YOU, and another book
18 was opened which is the Book of Life, and I saw the dead, YOU, both great
19 and small, and the dead, YOU, and the dead, YOU, were judged out of those
20 things which were written in the books according to their works.

21 3. And Death and Hell, YOU, were cast into the Lake of Fire, YOU.
22 This is the Second Death, YOU. And whosoever, YOU, was not found written
23 in the Book of Life was cast into the Lake of Fire, YOU,

24 VALIDATED, VERIFIED, CERTIFIED, AND CONFIRMED, MAY 12, 2020

25 4. Jurisdiction founded on the existence of a federal question and
26 amount in controversy.

27 5. The action arises under the Constitution of the United States,
28 Article III, Section II, as hereinafter more fully appears.

1 6. The amount is controversy exceeds, exclusive of interests and
2 costs, the sum of \$1,000,000,000.00

3 7. On or about the 2nd day of August, 1999, without probable cause
4 therefor, the County of Montgomery, Et Al through sheriff's officers
5 trespassed the premises of San Souci Apartments, 547 South Perry Street,
6 Montgomery, Alabama, Plaintiff's lawful and legal residence, abducted
7 and kidnapped the Plaintiff from 547 South Perry Street, Montgomery, Al.
8 and dragged the Plaintiff in handcuffs from 547 South Perry Street to
9 Jackson Hospital, 1725 Pine Street, Montgomery, Alabama. Thereafter,
10 the Plaintiff was incarcerated in Jackson Hospital, 1725 Pine Street
11 without probable cause therefor and the Plaintiff could not leave.

12 8. On or about August 9, 1999, without probable cause therefor,
13 the County of Montgomery, Et Al seized and harassed the Plaintiff again
14 and dragged the Plaintiff from Jackson Hospital, 1725 Pine Street to
15 Montgomery County Probate, 100 South Lawrence Street, Montgomery,
16 Alabama. Thereafter, without probable cause, County of Montgomery, Et Al

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1 instituted unlawful proceedings motivated by malice in fact against the Plaintiff in
2 the Montgomery County Probate without probable cause therefor.

3 6. On or about August 9, 1999, the County of Montgomery, Et Al harassed and
4 seized the Plaintiff again and dragged the Plaintiff without probable cause therefor
5 back to Jackson Hospital, 1725 Pine Street.

6 7. On or about August 11, 1999, the County of Montgomery, Et Al harassed and
7 seized the Plaintiff again and dragged the Plaintiff without probable cause therefor
8 to "Greil Memorial Psychiatric Hospital," 2140 Upper Wetumpka Road, Montgomery,
9 Alabama where the Plaintiff was incarcerated and could not leave.

10 8. On or about August 2, 1999, when the County of Montgomery, Et Al abducted
11 and kidnapped the Plaintiff without probable cause therefor and dragged the Plaintiff
12 to Jackson Hospital, 1725 Pine Street, dragged the Plaintiff to Montgomery County
13 Probate, 100 South Lawrence Street, and dragged the Plaintiff to Greil Memorial
14 Psychiatric Hospital, 2140 Upper Wetumpka Road, the County of Montgomery, Et Al in
15 the course of one unlawful act after another, procured the unlawful violation of the
16 personal liberty of the Plaintiff, and procured the false imprisonment of the
17 Plaintiff, for any appreciable time however brief. The County of Montgomery, Et Al,
18 in a series of well coordinated unlawful acts and detentions, committed the
19 NON-CONSENTUAL, intentional confinement of the Plaintiff without lawful privilege
20 therefor, and for any appreciable time however brief. The County of Montgomery,
21 Et Al purposely deprived the Plaintiff of freedom of movement by use of physical
22 barrier and force and other total and complete unreasonable duress, without the
23 Plaintiff's consent which harmed the Plaintiff, and such harm was substantially caused
24 by the County of Montgomery, Et Al's conduct.

25 9. On or about August 2, 1999, when the County of Montgomery, Et Al abducted
26 and kidnapped the Plaintiff without probable cause therefor and dragged the Plaintiff
27 to Jackson Hospital, 1725 Pine Street and dragged the Plaintiff to Montgomery County
Probate, 100 South Lawrence Street and dragged the Plaintiff to Greil Memorial

1 Psychiatric Hospital, 2140 Upper Wetumpka Road, the County of Montgomery Et Al in the
2 course of one unlawful act after another, committed the crime of first degree
3 kidnapping against the Plaintiff by knowingly restraining the Plaintiff with the
4 intent to place the Plaintiff in resonable apprehension of imminent physical injury.
5 In a series of well coordinated unlawful acts and detentions, the County of Montgomery,
6 Et Al's restriction of the Plaintiff's movement intended to place the Plaintiff in
7 reasonable fear of imminent physical injury. The County of Montgomery, Et Al's
8 seizure and detention of the Plaintiff with any accompanying movement is necessarily
9 sufficient to constitute first degree kidnapping, whether or not movement
10 substantially increased risk of harm.

11 10. On or about August 2, 1999, when the County of Montgomery, Et Al abducted
12 and kidnapped the Plaintiff without probable cause therefor and dragged the Plaintiff
13 to Jackson Hospital, 1725 Pine Street, dragged the Plaintiff to Montgomery County
14 Probate, 100 South Lawrence Street, and dragged the Plaintiff to Greil Memorial
15 Psychiatric Hospital, 2140 Upper Wetumpka Road, The County of Montgomery, Et Al, in
16 the course of one unlawful act after another, violated the Plaintiff's Fourth
17 Amendment rights under the United States Constitution

18 11. On or about August 2, 1999, when the County of Montgomery, Et Al abducted
19 and kidnapped the Plaintiff without probable cause therefor and dragged the Plaintiff
20 to Jackson Hospital, 1725 Pine Street, dragged the Plaintiff to Montgomery County
21 Probate, 100 South Lawrence Street, and dragged the Plaintiff to Greil Memorial
22 Psychiatric Hospital, 2140 Upper Wetumpka Road, the County of Montgomery, Et Al in
23 the course of one unlawful act after another, struck, shoved, kicked, and touched
24 the Plaintiff and subjected the Plaintiff to multiple unlawful physical contacts.

25 12. On or about December 19, 2002, without probable cause therefor, the County
26 of Montgomery, Et Al, Reese McKinney, D.T. Marshall through Montgomery sheriff's
27 officers, trespassed the premises of 547 South Perry Street in Montgomery, Alabama
28 and abducted and kidnapped the Plaintiff from 547 South Perry Street, Apt. 10, the

1 Plaintiff's lawful and legal residence, and dragged the Plaintiff from 547 South
2 Perry Street to Greil Memorial Psychiatric Hospital, 2140 Upper Wetumpka Road,
3 Montgomery, Alabama. Thereafter, the Plaintiff was incarcerated inside Greil Memorial
4 Psychiatric Hospital and could not leave.

5 13. On or about December 23, 2002, the County of Montgomery, Et Al harassed and
6 seized the Plaintiff and dragged the Plaintiff without probable cause therefor from
7 Greil Memorial Psychiatric Hospital, 2140 Upper Wetumpka Road to Montgomery County
8 Probate, 100 South Lawrence Street, Montgomery, Alabama. Thereafter, the County o
9 Montgomery, Et Al instituted unlawful proceedings motivated by malice in fact against
10 the Plaintiff in the Montgomery County Probate without probable cause therefor.

11 14. On or about December 23, 2002, the County of Montgomery, Et Al harassed and
12 seized the Plaintiff again and dragged the Plaintiff without probable cause therefor
13 from Montgomery County Probate, 100 South Lawrence Street back to Greil Memorial
14 Psychiatric Hospital, 2140 Upper Wetumpka Road where the Plaintiff was incarcerated
15 and could not leave.

16 15. On or about December 19, 2002, when the County of Montgomery, Et Al abducted
17 and kidnapped the Plaintiff without probable cause therefor and dragged the Plaintiff
18 to Greil Memorial Psychiatric Hospital, 2140 Upper Wetumpka Road, the County of
19 Montgomery, Et Al, in a series of well coordinated unlawful acts and detentions,
20 committed the NON-CONSENTUAL, intentional confinement of the Plaintiff without lawful
21 privilege therefor, and for any appreciable time however brief. The County of
22 Montgomery, Et Al purposely deprived the Plaintiff of freedom of movement by use of
23 physical barrier and force and other total and complete unreasonable duress, without
24 the Plaintiff's consent which harmed the Plaintiff, and such harm was substantially
25 caused by the County of Montgomery, Et Al's conduct. The County of Montgomery, Et Al,
26 in the course of one unlawful act after another, procured the unlawful violation of
27 the personal liberty of the Plaintiff, and procured the false imprisonment of the
28 Plaintiff for any appreciable time, however brief.

1 16. On or about December 19, 2002, when the County of Montgomery, Et Al abducted
 2 and kidnapped the Plaintiff without probable cause therefor and dragged the Plaintiff
 3 to Greil Memorial Psychiatric Hospital, 2140 Upper Wetumpka Road, the County of
 4 Montgomery, Et Al, in the course of one unlawful act after another, committed the
 5 crime of first degree kidnapping against the Plaintiff by know restraining the
 6 Plaintiff with the intent to place the Plaintiff in reasonable apprehension of
 7 imminent physical injury. In a series of well coordinated unlawful acts and detentions,
 8 the County of Montgomery, Et Al's restriction of the Plaintiff's movement intended
 9 to place the Plaintiff in reasonable fear of imminent physical injury. The County of
 10 Montgomery, Et Al's seizure and detention of the Plaintiff with any accompanying
 11 movement is necessarily sufficient to constitute first degree kidnapping, whether or
 12 not movement substantially increased risk of harm.

13 17. On or about December 19, 2002, when the County of Montgomery, Et Al abducted
 14 and kidnapped the Plaintiff without probable cause therefor, and dragged the Plaintiff
 15 to Greil Memorial Psychiatric Hospital, 2140 Upper Wetumpka Road, the County of
 16 Montgomery, Et Al in the course of one unlawful act after another, violated the
 17 Plaintiff's Fourth Amendment rights under the United States Constitution.

18 18. On or about December 19, 2002, when the County of Montgomery, Et Al abducted
 19 and kidnapped the Plaintiff without probable cause therefor and dragged the Plaintiff
 20 to Greil Memorial Psychiatric Hospital, 2140 Upper Wetumpka Road, the County of
 21 Montgomery, Et Al in the course of one unlawful act after another struck, shoved,
 22 kicked, and touched the Plaintiff and subjected the Plaintiff to multiple unlawful
 23 physical contacts.

24 19. As a proximate consequence of the Defendants' acts, the Plaintiff suffered
 25 mental anguish, deprivation of constitutional rights, and intentional infliction
 26 of emotional distress.

27 Wherefore Plaintiff will receive this Judgment Wherefore Plaintiff
 28 Wherefore Plaintiff orders this Judgment WHEREFORE THIS IS YOUR JUDGMENT:

1 2. And I saw the Great White Throne Judgment, and Him that sat upon
2 it from whose face the Earth and Heaven fled away, and there was found
3 no place for them, YOU, and the books were opened, YOU, and another book
4 was opened which is the Book of Life, and I saw the dead, YOU, both great
5 and small, and the dead, YOU, and the dead, YOU, were judged out of those
6 things which were written in the books according to their works.

7 3. And Death and Hell, YOU, were cast into the Lake of Fire, YOU.
8 This is the Second Death, YOU. And whosoever, YOU, was not found written
9 in the Book of Life was cast into the Lake of Fire, YOU.

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BILL LIETZKE
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MONTGOMERY, ALABAMA 36104

UNITED STATES DISTRICT COURT
DISTRICT OF TEXAS
800 FRANKLIN AVENUE
WACO, TEXAS 76701

